

Hon. Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CATALIN APOPEI and ADRIANA  
APOPEI,

Plaintiffs,

v.

SAFECO INSURANCE COMPANY OF  
AMERICA, a foreign company,

Defendant.

NO. 2:24-cv-01013-JNW

STIPULATED MOTION AND  
~~[PROPOSED]~~ ORDER TO STAY

NOTED ON CALENDAR:  
JULY 17, 2024

**STIPULATION**

The parties hereby stipulate and agree as follows:

1. The Complaint in this matter was filed on March 11, 2024. The Summons and Complaint were served on the office of the insurance commissioner on June 5, 2024. Safeco Insurance Company of America's ("Safeco") registered agent, CSC, was served June 10, 2024.
2. Safeco removed this case to federal court on July 10, 2024.
3. This case concerns insurance coverage provided by Safeco for a home owned by Plaintiffs Catalin and Adriana Apopei that experienced a covered loss on or about December 20, 2022.

STIPULATED MOTION AND ~~[PROPOSED]~~ ORDER TO  
STAY - 1

GORDON TILDEN THOMAS CORDELL	600 University Street Suite 2915 Seattle, WA 98101 206.467.6477
---------------------------------------	--

4. The Apopeis filed a claim with Safeco following the covered loss. The claim continues to be adjusted. Safeco has paid some, but not all, of the Apopeis' insurance claim. The parties dispute the remaining amounts Safeco owes to the Apopeis.

5. The parties wish to engage in settlement discussions to see if they can resolve this matter without incurring additional litigation-related expenses. The parties request a three-month stay to allow them time to engage in settlement negotiations.

6. Judicial economy is best served by a three-month stay of the proceedings so that the parties can focus on their attempts to resolve this matter without incurring further litigation-related expenses and without further use of Court resources.

I certify that this memorandum contains 210 words, in compliance with the Local Civil Rules.

STIPULATED this 17<sup>th</sup> day of July, 2024.

**GORDON TILDEN THOMAS & CORDELL LLP**  
Attorneys for Plaintiffs

By s/ Kasey D. Huebner

Kasey D. Huebner, WSBA #32890  
Katherine S. Wan, WSBA #58647  
600 University Street, Suite 2915  
Seattle, Washington 98101  
206.467.6477

[khuebner@gordontilden.com](mailto:khuebner@gordontilden.com);  
[kwana@gordontilden.com](mailto:kwana@gordontilden.com)

**FORSBERG & UMLAUF, P.S.**  
Attorneys for Defendant

By s/Matthew S. Adams

Matthew S. Adams, WSBA #18820  
Jennifer E. Aragon, WSBA #45270  
901 Fifth Avenue, Suite 1400  
Seattle, WA 98164  
206-689-8500

[madams@foum.law](mailto:madams@foum.law); [jaragon@foum.law](mailto:jaragon@foum.law)

**ORDER**

This matter is STAYED until October 31, 2024. Either party may move the Court to terminate the stay upon 15 days' written notice to the other party. If neither party moves to terminate the stay, the parties will file a Joint Status Report addressing the topics in Rule 26(f)(3) and LCR26(f) by October 17, 2024.

DATED this 2nd day of August, 2024.



Hon. Jamal N. Whitehead  
United States District Court Judge